



Appendix A

Clearing permit offset proposal form

Environmental Protection Act 1986

1. Occupier's details	
Date: Clearing permit application number:	CPS 4 February 2022
Applicant:	
Phone numbers:	[REDACTED]
Email:	
Contact person or environmental specialist:	
Name:	[REDACTED]
Company:	
Phone numbers:	
Email:	
Environmental specialist's qualifications or equivalent, and relevant experience:	
Purpose of clearing:	Sand extraction and earthworks in advance of urban subdivision
Land details of the clearing application area:	Lots 2-5 on DP407125, Folio 2901, Volumes 250-253
Total area of the proposed clearing (hectares):	39

2. Proposed on site mitigation (if applicable)	
Area (ha) / number of trees to be planted:	23,000 trees over 28ha
Other on ground management actions proposed:	See Revegetation Management Plan (Attachment 7)
Future tenure and/or zoning: (e.g. a conservation covenant will be placed on the certificate of title after sand mining and rehabilitation is undertaken)	Residential development

Estimated future vegetation condition (Keighery scale):	Very Good
Proposed commencement date of rehabilitation and revegetation:	Autumn immediately following the start of clearing
Proposed completion date of rehabilitation and revegetation: (date by which the benefit for the species/vegetation community impacted has been achieved)	Planting completed 2 yrs after commencement. Monitoring and maintenance will continue for 20 years after commencement.
Is a revegetation plan attached?	Yes (Attachment 7)
Is the spatial data for the location of on site mitigation provided (ESRI shapefile format)?	Yes
Estimated cost of mitigation (on site rehabilitation and revegetation):	\$157,000

3: Proposed offset site (off site location)	
Land details:	To be advised by DBCA
Area (ha) or number of trees at site prior to offset being undertaken:	113ha
Type of offset: (rehabilitation and revegetation, on ground management or land acquisition)	Acquisition
Current scheme zoning: (region or local scheme)	Rural
Are there any development approvals? (for example, extractive industry license or <i>Environment Protection and Biodiversity Conservation Act 1999</i> approval)	No
Future tenure and/or zoning: (e.g. proposed to change local council reserve from recreation to conservation purposes)	Conservation reserve (subject to DBCA)
Current vegetation condition (Keighery scale):	Very Good to Excellent
Future predicted vegetation condition, if rehabilitation and revegetation or other on ground management are being carried out as part of the offset proposal (Keighery scale):	Very Good to Excellent
Proposed commencement date of rehabilitation and revegetation and/or other on ground management:	To be advised by DBCA

Proposed completion date of rehabilitation and revegetation and/or other on ground management: (date by which the benefit for the species/vegetation community impacted has been achieved)	To be advised by DBCA
Proposed date of land acquisition or method of securing the tenure of the site:	To be advised by DBCA
Is the environmental survey of the offset site attached?	No
Is a revegetation plan attached (if required)?	No
Is the spatial data for the location of the offset site provided (ESRI shapefile format)?	To be advised by DBCA
Is the spatial data for the environmental survey of the offset site provided (ESRI shapefile format) (vegetation condition and type, locations of habitat trees)	No
Estimated cost of the offset:	\$169,500

4. Information demonstrating that the offset policy principles have been addressed (if you require more space for this section, please attach separate documents)

1.Environmental offsets will only be considered after avoidance and mitigation options have been pursued.
Please explain how the significant impacts of the project (as identified by DER or DMP in the preliminary assessment report provided to the applicant) have been avoided and/or minimised. You should explain how each of the mitigation hierarchy steps (avoid, minimise, rehabilitate) have been applied to address each significant impact (that is, each clearing principle that is at variance), from the original proposed clearing application area through to the current proposed clearing application area. Offsets are only applied to the significant residual impact that remains after these steps have been taken.

Impacts have been identified by the EPA in its advice on the TPS Amendment as:

1. Protection and management of adjacent Resource Enhancement Category wetland
2. Protection and management of Regional Open Space
3. Impact on potential black cockatoo feeding and/or breeding habitat.

These impacts have been and will be managed as follows:

1. The RE wetland and agreed buffer have been ceded to the State as Parks & Recreation Reserve. A Wetland Management Plan (BES, 2020) has been prepared and is attached to the Clearing Permit application (Attachment 9).
2. Lot 317 Maidment Parade, previously part of Mr Piacentini’s landholding, has been transferred along with the RE wetland to the State as Parks & Recreation Reserve. A Regional Open Space Management Plan (BES, 2020) has been prepared and is attached to the Clearing Permit application (Attachment 10).
3. Mr Piacentini has committed to planting 28ha of Tuart, Jarrah, Peppermint, Banksia, Paperbark and understorey species in the ROS to create a habitat corridor for black cockatoos and Western Ringtail Possums extending through the site from east to west. A Revegetation Plan (BES, 2018) has been prepared and is attached to the Clearing Permit application (Attachment 7).
 Mr Piacentini has also committed to establishing at least twelve "Cockatube" nest boxes (or 20% more than the number of potential nest boxes removed in the clearing, whichever is the greater) within the ROS. Mr Piacentini will monitor and maintain the nest boxes for five years.
 Mr Piacentini has also committed to paying \$169,500 to the DBCA to fund the acquisition of 113ha of black cockatoo feeding and breeding habitat near Gingin. The funds will be paid to DBCA prior to the start of clearing, under conditions of approval issued by the Commonwealth.

2. Environmental offsets will be cost-effective, as well as relevant and proportionate to the significance of the environmental value being impacted.

You should explain how the proposed offset will address each of the impacts described under the biodiversity related clearing principle(s) that the application is at variance to (as outlined in the DER or DMP preliminary assessment report provided to the applicant). Under each principle at variance, you should provide information on each environmental value that may be removed or decline as a result of the clearing and how the offset will provide equivalent or better replacement for these values (e.g. fencing the site, other habitat provided, etc.)

It is preferable that the design of an offset leads to a net gain in size, density and diversity of native vegetation and an overall improvement in the condition of the natural environment and the specific environmental values requiring offsetting. Please include information on how your offset has given consideration to ecosystem function, rarity, connectivity, vegetation condition, habitat quality and the type of ecological community cleared.

The requirement for 'equivalent or better replacement' is the key to successfully addressing this offset principle. For example, if breeding habitat (trees with hollows) for Carnaby's cockatoo is cleared then it is not appropriate to propose feeding habitat as an offset.

You may also provide information detailing expertise and demonstrated success in rehabilitation of the same vegetation type.

The proposal is possibly at variance to Principle (b): Habitat for rare fauna.

The project area contains approximately 54 Tuart and Marri trees that are considered potential nesting sites for Carnaby's Black Cockatoo (Bamford, 2012). It also contains poor quality habitat (in the form of scattered Peppermint trees) for Western Ringtail Possums (Bamford, 2012; Harewood, 2007 & 2012; Green Iguana, 2006).

The potential impacts of WRP and black cockatoo habitat will be mitigated by habitat creation and land acquisition as detailed above.

3. Environmental offsets will be based on sound environmental information and knowledge.

Describe how the environmental specialist has been involved in the design of the offset proposal and how and when an environmental specialist will be involved in the implementation and monitoring of the offset.

An environmental specialist means a person who is engaged by the permit holder for the purpose of providing environmental advice, who holds a tertiary qualification in environmental science or equivalent, and has experience relevant to the type of environmental advice that is required under the clearing permit and offset proposal.

You must describe the methodology for determining the components of an offset proposal. For example, this may include the identification of a suitable site based on landform, soil, proximity, species composition and relationship to the environmental values impacted.

If your offset includes rehabilitation and revegetation, please provide evidence of how the completion criteria were determined as appropriate and evidence of your ability to successfully meet those criteria. (Note. You may refer to the revegetation plan rather than repeat information)

HABITAT CREATION

The creation of black cockatoo and WRP habitat will be undertaken in accordance with a Revegetation Management Plan prepared by Bayley Environmental Services based on baseline fauna surveys by Bamford Ecological Consulting, zoologist Greg Harewood and Green Iguana. The plan was prepared in consultation with Mr Kim Williams and Mr Peter Hanly of DPAW and was approved by the Commonwealth Dept of Agriculture, Water & Environment (then DEE) in December 2018.

LAND ACQUISITION

The area of black cockatoo habitat to be acquired was determined and agreed with DAWE using the department's Offset Calculator. The cost of the acquisition was determined and agreed with DPAW based on the upper price range of land acquired to date in the Gingin area by DPAW. The specific parcel of land to be acquired will be selected by DPAW in line with its ongoing land acquisition program.

4. Environmental offsets will be applied within a framework of adaptive management.

Adaptive management involves defining the problem, establishing goals, implementing the action (including monitoring plans), evaluating the results and adapting in response to new information. For environmental offsets, this principle primarily relates to rehabilitation and revegetation or on ground management of native vegetation.

An adaptive management approach requires that contingency measures are in place to respond if monitoring determines an offset is not on track to meet completion criteria.

You should briefly describe the following (detailed information should be provided in the revegetation plan):

- Objectives
- Brief description of how the offset will be implemented (including timeframes)
- Monitoring techniques and timeframes
- Contingencies (e.g. monitoring results may trigger infill planting to ensure rehabilitation is successful).

The objective of the planting programme is to create a high-quality habitat linkage for WRP and black cockatoos from west to east through the newly created ROS reserve on Lot 317.

The planting programme will begin with weed control in the autumn immediately following the commencement of clearing (Year 1). Planting trials will begin in early winter of Year 2 and will continue for one year. Full-scale planting will begin in early winter of Year 3 and will be completed within one year.

Post-planting monitoring, maintenance and infill planting as necessary will continue for at least five years or until the completion criteria (as detailed in the Revegetation Management Plan) are achieved. Annual monitoring and maintenance including aerial photography canopy cover measurement, firebreak maintenance, five-yearly fauna habitat surveys and infill planting if required will continue for a further 15 years.

5. Environmental offsets will be focused on longer term strategic outcomes.

Before an offset can be approved, you must ensure that any other licences or approvals that are required have been obtained, and provide evidence of these. Examples include a letter of support from the landowner of an offset acquisition, a copy of the applicant's licence to collect seed or a licence to relocate fauna.

Explain what management processes will be implemented to ensure that there is an environmental benefit achieved over the longer term. You must be able to demonstrate that the tenure of the offset is secure and provides a long term conservation benefit for the environmental value/s impacted by the clearing. For example, an offset may be based on the types of actions proposed in a species recovery plan but additional to work already undertaken by the Department of Parks and Wildlife or land manager and not part of normal responsibilities.

HABITAT CREATION

The land to be planted to create WRP and black cockatoo habitat was originally part of Mr Piacentini's landholding but is now owned by the State government and zoned as Regional Open Space. It is expected to be vested in DPAW to be managed for conservation. The timing and terms of this vesting are outside the control of Mr Piacentini.

The WAPC has agreed to grant Mr Piacentini access to the ROS reserve for the purposes of the planting programme and subsequent monitoring and maintenance. A letter from the WAPC to this effect is attached in Appendix B to the Revegetation Management Plan.

LAND ACQUISITION

The provision of funding for purchase of black cockatoo habitat is aligned with the DBCA's ongoing programme of land acquisition.

All of the land parcels purchased to date have been uncleared portions of freehold farm land. The DBCA's strategy is to purchase the best quality cockatoo habitat available. All of the parcels purchased to date have had very good to excellent habitat quality. Without reservation, these parcels would be expected to degrade over time as a result of incidental impacts from farming (e.g. cattle ingress, fire, weed invasion, dieback, edge effects) despite the restrictions on clearing under State legislation. Their purchase for conservation significantly improves their security and protection compared to being left as parts of operating farms.

The DBCA prefers the current model, where it receives external funding to undertake the purchases itself, to the alternative of having private companies purchase offset land and hand it to the DBCA for management. This is for several reasons:

1. The DBCA is able to directly control which parcels it purchases, enabling it to acquire the highest quality habitat for conservation.
2. The DBCA's status as a State government agency enables it to obtain subdivisions of rural properties that are not readily available to private purchasers.
3. Pooling of funds enables the purchase of much larger land parcels than would be possible on a piecemeal basis.
4. The DBCA is able to identify available land parcels and negotiate their purchase on a scale that would be impossible for individual proponents looking for single parcels.

5. Ongoing commitments and consultation	
<p>Monitoring commitment (including costs): (Note: you may refer to the revegetation plan here, if applicable, rather than repeat information.)</p>	<p>Management and monitoring of planted habitat: \$29,000. Management and monitoring of purchased land: Included in funding package.</p>
<p>Management commitment (including costs): (Note: you may refer to the revegetation plan here, if applicable, rather than repeat information.)</p>	
<p>Agencies or other organisations consulted and submissions received:</p>	<p>Department of Biodiversity, Conservation and Attractions (DBCA): Preparation of Revegetation Management Plan: Mr Kim Williams and Mr Peter Hanly. Identification and budgeting of land purchase: Mr Alex Errington.</p> <p>Design of planting programme and scoping of land acquisition: Department of Agriculture, Water & Environment (Cwth).</p>

6. Other	
<p>Please note that contaminated site/s classified under the <i>Contaminated Sites Act 2003</i> (past refuse disposal facilities, maintenance yards) are not considered to be suitable offset sites</p>	<input checked="" type="checkbox"/> Noted
<p>You must ensure all laws are complied with (e.g. <i>Native Title Act 1993</i>) and that necessary approvals are obtained (e.g. from landowner/s on which the offset will occur in the event that the subject land is not vested with the applicant) prior to submission.</p>	<input checked="" type="checkbox"/> Noted
<p>The agreed offset proposal document and revegetation plan may be published on the WA Environmental Offsets Register.</p>	<input checked="" type="checkbox"/> Noted